

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL REDACTED OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO FILED AMENDED COMPLAINT**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Castle Hill's previously-filed redacted Opposition to Plaintiff's Motion for Leave to File Amended Complaint (the "Redacted Opposition") (ECF No. 77). In support of this request to seal, Defendants state as follows:

1. Portions of the Redacted Opposition contain information which either Plaintiff or Defendants has designated as sensitive and/or proprietary trade secret information. Pursuant to paragraph 2(c) of the Protective Order, such information is to be treated as Highly Confidential Information.

2. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, Redacted Opposition (ECF No. 77), and a sealed, unredacted Opposition (ECF No. 79).

3. On Friday, June 22, 2018 at 6:04 p.m. EDT, counsel for Plaintiff wrote to counsel for Defendants expressing concern that the redactions in the Redacted Opposition were not properly applied in certain respects.

4. On Friday, June 22, 2018, at 6:42 p.m. EDT, after investigating the issue, counsel for Defendants wrote to counsel for Plaintiffs, stating that Defendants would move to seal the document as quickly as possible.

5. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill plans to file a replacement redacted Opposition concurrently with or shortly after filing this Motion. Castle Hill has already filed its sealed, unredacted Opposition (ECF No. 79).

WHEREFORE, Defendants respectfully request that the Court enter an Order granting this Motion to Seal and sealing Defendants' previously-filed redacted Opposition to Plaintiff's Motion for Leave to File Amended Complaint (ECF No. 77).

Dated: June 22, 2018

Respectfully submitted,

/s/ Jeremy B. Darling

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2018, I caused a copy of the foregoing **Defendants' Motion to Seal Redacted Opposition to Plaintiff's Motion for Leave to File Amended Complaint** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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